

JEFFRIES vs. Centre Life Insurance Co., et al.  
September 19, 2003

CORWIN DUNN, M.D.

UNITED STATES DISTRICT COURT

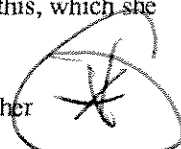
SOUTHERN DISTRICT OF OHIO

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ERIC L. JEFFRIES, :  
 :  
 Plaintiff, :  
 vs. : Case No. C-1-02-351  
 : (Judge S. S. Beckwith)  
 CENTRE LIFE INSURANCE :  
 COMPANY, et al., :  
 :  
 Defendants. :  
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Deposition of CORWIN DUNN, M.D., a witness  
herein, called by the defendants for examination,  
pursuant to the Federal Rules of Civil Procedure,  
taken before me, Tracy L. Allen, a Registered  
Professional Reporter and Notary Public in and for  
the State of Ohio, at 2223 Auburn Avenue,  
Cincinnati, Ohio, on Friday, September 12, 2003, at  
2:15 PM.

JENNIFER VS. CONSUMERS LIFE INSURANCE CO., et al.  
September 19, 2003

CORWIN DUNN, M.D.

<p style="text-align: right;">Page 66</p> <p>1 A. February 23rd, 2001.</p> <p>2 Q. Okay.</p> <p>3 A. Yes.</p> <p>4 Q. And did you have any objective findings on</p> <p>5 the physical exam?</p> <p>6 A. Again, I saw the small, two- to</p> <p>7 three-millimeter ulcer -- this time it was an</p> <p>8 ulcer -- on the hard palate. And actually there</p> <p>9 were four to five of them. And I saw the thyroid</p> <p>10 scar to which he had alluded that he had this</p> <p>11 thyroid surgery. Then again there are no lymph</p> <p>12 nodes in his neck. And that was all.</p> <p>13 Q. Was he able to move about all right, talk</p> <p>14 to you okay?</p> <p>15 A. Yes.</p> <p>16 Q. Didn't have to fish for words, or lose his</p> <p>17 place, or not able to communicate his concerns?</p> <p>18 MR. ROBERTS: Objection.</p> <p>19 Q. Or theories?</p> <p>20 MR. ROBERTS: Objection.</p> <p>21 A. No.</p> <p>22 MR. ROBERTS: Basis.</p> <p>23 A. But I wouldn't rule out the possibility</p> <p>24 that his normal IQ is 170 and it dropped down to 120</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. What was the disagreement with the</p> <p>2 synopsis?</p> <p>3 A. Do you have it?</p> <p>4 Q. I do not.</p> <p>5 MR. ROBERTS: You have that.</p> <p>6 MR. ELLIS: I don't have it with me.</p> <p>7 MR. ROBERTS: Oh.</p> <p>8 Massachusetts Casualty is his client.</p> <p>9 THE WITNESS: Okay.</p> <p>10 A. Well, it's fairly extensive.</p> <p>11 Q. Well, let's go back to the beginning</p> <p>12 point. She called you and asked to discuss the case</p> <p>13 with you.</p> <p>14 A. Yes.</p> <p>15 Q. And did she discuss the case with you?</p> <p>16 A. Yes.</p> <p>17 Q. Did she have any suggestions,</p> <p>18 recommendations, or ask you to take a certain</p> <p>19 position with regard to the case?</p> <p>20 A. No.</p> <p>21 Q. Okay.</p> <p>22 A. She was --</p> <p>23 Q. She was asking rather than telling?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 67</p> <p>1 leaving him still articulate.</p> <p>2 Q. Something you can't rule out or rule in.</p> <p>3 A. Correct.</p> <p>4 Q. Okay. Doctor, at some point you were</p> <p>5 asked to prepare an affidavit for Mr. Jeffries. Do</p> <p>6 you recall that?</p> <p>7 A. I do.</p> <p>8 Q. First of all, who asked you to prepare</p> <p>9 such an affidavit?</p> <p>10 A. Well, there were two things going on. And</p> <p>11 one was for Mr. Roberts. And another was a contact</p> <p>12 from -- who was this? I think an independent</p> <p>13 medical case specialist representing or</p> <p>14 investigating for Massachusetts Casualty Insurance</p> <p>15 Company.</p> <p>16 Q. What were you asked from this person from</p> <p>17 you think Massachusetts Casualty?</p> <p>18 A. This was a woman named Lucinda Palmer who</p> <p>19 wished to do an interview or phone interview. And</p> <p>20 then she came up with a synopsis of this, which she</p> <p>21 wanted me to sign.</p> <p>22 Q. And were you able to --</p> <p>23 A. I was basically not happy with her</p> <p>24 synopsis. So I didn't sign it.</p> 	<p style="text-align: right;">Page 69</p> <p>1 Q. And she attempted to apparently send you a</p> <p>2 series of notes related to that conversation with</p> <p>3 which you had some disagreement.</p> <p>4 A. Correct.</p> <p>5 Q. Were there specific areas of disagreement?</p> <p>6 A. As I recall, there were.</p> <p>7 Q. Okay.</p> <p>8 A. Let me just review that.</p> <p>9 Q. Sure.</p> <p>10 A. I can probably tell you. Right. There is</p> <p>11 one -- if you recall the general tone of the letter,</p> <p>12 I don't -- I don't contest that. I mean, I think</p> <p>13 that's fine.</p> <p>14 The final paragraph, though, was -- her</p> <p>15 next to final paragraph was, Upon reviewing the</p> <p>16 notes of our conversation, in order to create this</p> <p>17 letter, I conclude the following. And this is</p> <p>18 Lucinda Palmer speaking.</p> <p>19 Mr. Jeffries comes to see you periodically</p> <p>20 with complaints of fatigue. The only abnormal</p> <p>21 clinical findings of which you're aware of are a</p> <p>22 positive anti-microsomal antibody test which does</p> <p>23 support the symptoms, and findings of a RNAL protein</p> <p>24 termination test, which is not recognized by you or</p>

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